

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|-----------------------------------|---|---------------------|
| CATHY RINZLER | : | CIVIL ACTION |
| | : | |
| | : | |
| | : | NO. 23-CV-4058 |
| v. | : | |
| | : | JURY TRIAL DEMANDED |
| SIMON PROPERTY GROUP, L.P., et al | : | |
| | : | |

STIPULATION

Plaintiff Cathy Rinzler as well as Defendants Simon Property Group L.P., Simon Property Group, Inc., Chelsea Pocono Finance LLC., and Pocono Premium Outlets by and through their undersigned counsel, hereby STIPULATE and agree as follows:


1. On November 7, 2021, Chelsea Pocono Finance LLC. owned the Crossing Premium Outlets (since rebranded as “Pocono Premium Outlets”).
2. Defendants Simon Property Group L.P., Simon Property Group Inc., and Pocono Premium Outlets, individually and with the d/b/a designations listed in the Complaint, are hereby dismissed without prejudice.
3. Defendant Chelsea Pocono Finance LLC. shall have 20 days after Court approval of this stipulation to answer the Complaint.
4. This stipulation may be signed in counterparts.

J.

GEKOSKI & BOGDANOFF, P.C.

BY: /s/ Michael S. Bogdanoff
Michael S. Bogdanoff, Esquire
Attorney for Defendants
Simon Property Group LP,
Simon Property Group, Inc.,
Chelsea Pocono Finance LLC. and
Pocono Premium Outlets
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KALIKHMAN & RAYZ LLC

By: 
Lawrence Kalikhman, Esquire
Attorney for Plaintiff
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Date: November 27, 2023